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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THOMAS CLARENCE COUSEY, et al.,

Plaintiff,

VS.

CITY OF OAKLAND, et al.,

Defendants.

Case No.: C05-01117 TEH

STIPULATION AND ~~[PROPOSED]~~ ORDER EXTENDING TIME TO COMPLETE EXPERT DISCLOSURES AND EXPERT DISCOVERY

1 WHEREAS, plaintiffs had intended to disclose Frank Saunders as their police practices
2 expert pursuant to F.R.C.P. 26; whereas plaintiffs' counsel has learned that Mr. Saunders is now
3 deceased; and whereas plaintiffs need additional time to retain police practices expert(s) for trial,

4 IT IS HEREBY STIPULATED AND AGREED THAT the deadline for disclosure of the
5 identities of expert witnesses should be extended for both plaintiffs and defendants as set forth
6 below. Other than with respect to the disclosure of the identities of the experts, the parties
7 anticipate at this time that they will be able to comply with the other deadlines set forth in the
8 Court's Order for Pretrial Preparation.

9 Plaintiffs' Deadline to Disclose Identity of Experts: January 5, 2007

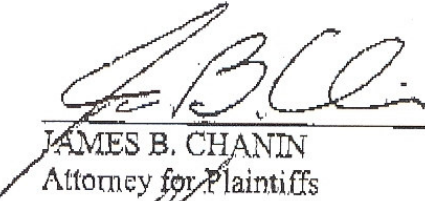
10 Defendants' Deadline to Disclosure Identity of Experts: January 19, 2007

11 Both Parties' Deadline to Comply with Rule 26 Expert Disclosures: February 2, 2007

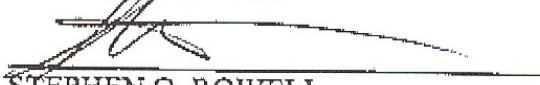
12 Both Parties' Deadline to Complete Expert Depositions: February 6, 2007

13 IT IS SO STIPULATED:

14 Dated: November 7, 2006


JAMES B. CHANIN
Attorney for Plaintiffs

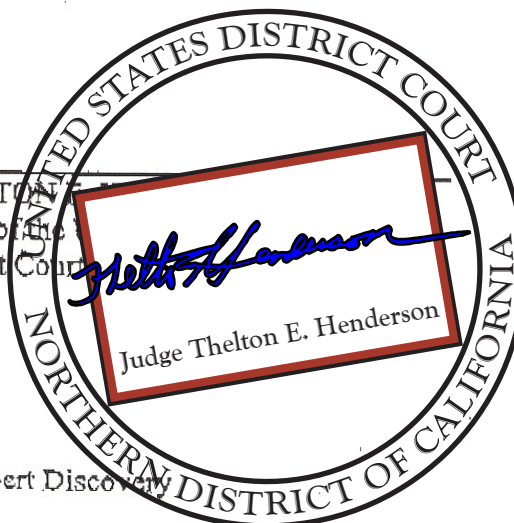
16 Dated: November 7, 2006


STEPHEN Q. ROWELL
Attorney for Defendants

18 PURSUANT TO STIPULATION,
19 IT IS SO ORDERED:

20 Dated: November 13, 2006

21 THELTON
Judge of the
District Court



24 Stip/Order Re Extending Expert Disclosure and Expert Discovery
Case No C05-01117 TEH